



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 West 15<sup>th</sup> St, Suite 3200  
HELENA, MONTANA 59626

Ref: 8MO

May 22, 2008

Mr. Paul Bradford, Supervisor,  
Kootenai National Forest  
1101 U.S. Hwy 2 West  
Libby, MT 59923

Re: CEQ # 20080170, EPA Comments on  
Young Dodge Project FEIS & ROD

Dear Mr. Bradford:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Kootenai National Forest's Young Dodge Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to agency and public comments and concerns identified during review of the DEIS, including the disclosure of information on proposed logging methods (which had inadvertently been left out of the DEIS). We are concerned that the majority of timber harvesting is to be carried out via more disturbing ground skidding methods with greater potential for erosion and sediment production (i.e., approximately 1455 of 1927 acres of timber harvest appear to be proposed via ground skidding), including units 12, 21, 212, 220 which are already be near the Regional Standard of 15 percent detrimental soil disturbance. It would appear to us that less ground disturbing logging methods would be appropriate at least for logging units that are already near the standard for cumulative detrimental soil disturbance levels. We generally encourage use of less ground disturbing logging methods as much as possible (e.g., skyline, helicopter, logging during winter on snow or frozen ground, etc.). We are pleased that the FEIS states that no timber harvest will take place on landtypes with severe sediment hazards.

In addition, we are disappointed that the preferred alternative does not include a modification for closure of segments of Roads #303 and #7168 to allow open road density standards for MA 12 to be met. We support closure of 1.19 miles of Road #303 and 0.17 miles of Road #7168, both of which are currently open yearlong, which had been proposed in Alternative 3 to meet the MA 12 open road density standard of 0.75 mi/mi<sup>2</sup> during project implementation and over the long-term. Such road closures would reduce fragmentation of wildlife habitat and risks to wildlife security.

We are supportive of the proposed reduction of hazardous fuels and fire risk in wildland urban interface (WUI) areas near homes and structures where there is high fire risk, and restoration of declining tree species such as Ponderosa pine and western larch. We are also pleased that the proposed project includes no new road construction, and would decommission 12 miles of existing road and place 27 miles of roads in long-term storage, and includes road maintenance activities on portions of 100 miles of roads in order to reduce road impacts to soil and water resources. EPA fully supports road BMP and drainage improvements, and road decommissioning and reductions in road density, since these are critical to protecting aquatic health. Reductions in road density, especially road stream crossing density, are often correlated with improved aquatic health, as well as improved wildlife habitat and security.

We appreciate the opportunity to participate in the NEPA process, and review and comment on the EIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov). Thank you for your consideration.

Sincerely,

/s/  
John F. Wardell  
Director  
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver  
Glen McNitt, District Ranger, Eureka